

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER PARTNERS II LLC,

Plaintiff and Counterclaim-Defendant,

v.

T-MOBILE USA, INC. AND SPRINT LLC,

Defendants and Counterclaim-Plaintiffs.

HEADWATER PARTNERS II LLC,

Plaintiff and Counterclaim-Defendant,

v.

AT&T SERVICES, INC., AT&T MOBILITY,
LLC AND AT&T CORP.,

Defendants and Counterclaim-Plaintiffs.

Case No. 2:24-cv-00015-JRG-RSP

(LEAD CASE)

JURY TRIAL DEMANDED

Case No. 2:24-cv-00016-JRG-RSP

(MEMBER CASE)

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
DISCOVERY ORDER**

Plaintiff Headwater Partners II LLC (“Headwater”) and Defendants T-Mobile USA, Inc. and Sprint LLC (collectively, “T-Mobile”) and AT&T Services, Inc., AT&T Mobility, LLC and AT&T Corp. (collectively, “AT&T”) (all together, the “Parties”), hereby jointly request that the Court enter the proposed Discovery Order, attached hereto as Exhibit A.

Dated: April 25, 2024

/s/ Jacob K. Baron

Jacob K. Baron, Esq.
MA Bar No.: 652568
Email: jacob.baron@hklaw.com
Joshua C. Krumholz, Esq.
(LEAD COUNSEL)
(*Pro hac vice*)
MA Bar No.: 552573
Email: joshua.krumholz@hklaw.com
Jacob W. S. Schneider, Esq.
(*Pro hac vice*)
MA Bar No.: 675315
Email: jacob.schneider@hklaw.com
Allison M. Lucier, Esq.
(*Pro hac vice*)
MA Bar No.: 569193
Email: allison.lucier@hklaw.com
HOLLAND & KNIGHT LLP
10 Saint James Avenue; 11th Floor
Boston, MA 02116
Telephone: 617-523-2700
Facsimile: 617-523-6850

Nicholas Mathews
Texas State Bar No. 24085457
nmathews@McKoolSmith.com
Texas State Bar No. 24078867
Erik Fountain
efountain@McKoolSmith.com
Texas State Bar No. 24097701
MCKOOL SMITH, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Deron R. Dacus
Texas Bar No. 00790553
E-mail: ddacus@dacusfirm.com
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, Texas 75701
903-705-1117 (phone)
903-581-2543 (fax)

/s/ Marc Fenster

Marc Fenster
CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com
Ben Wang
CA State Bar No. 228712
Email: bwang@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Paul Kroeger
CA State Bar No. 229074
Email: pkroeger@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
Email: nrubin@raklaw.com
Kristopher Davis
CA State Bar No. 329627
Email: kdavis@raklaw.com
James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com
Philip Wang
CA State Bar No. 262239
Email: pwang@raklaw.com
Amy Hayden
CA State Bar No. 287026
Email: ahayden@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com
James N. Pickens
CA State Bar No. 307474
Email: jpickens@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

*Attorneys for Defendants T-Mobile USA, Inc.
Sprint LLC, AT&T Services, Inc., AT&T
Mobility, LLC and AT&T Corp.*

*Attorneys for Plaintiff
Headwater Partners II LLC*

Melissa R. Smith
melissa@gillamsmithlaw.com
GILLIAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

*Attorney for Defendants T-Mobile USA, Inc.
Sprint LLC*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this April 25, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster
Marc Fenster